## LOS ANGELES COUNTY DEPARTMENT OF PUBLIC HEALTH ENVIRONMENTAL HEALTH DIVISION DRINKING WATER PROGRAM

TO: INMYUNG LEE AND NANCY HYONAM LEE

23939 WINDWARD LANE VALENCIA CA 91355

**RE:** THE VILLAGE MOBILE HOME PARK

231 W AVENUE G

LANCASTER CA 93534-7600

SYSTEM NO. 1900520 - NOTICE OF VIOLATION (NOV) - #04\_49\_18C\_014\_1900520\_52

## LEAD AND COPPER RULE (LCR) REPORTING AND RECORDKEEPING VIOLATION

**DATED:** March 22, 2018

The purpose of this letter is to notify The Village Mobile Home Park (System) of the Lead and Copper Rule (LCR) Reporting and Recordkeeping violation due to a failure to report the Lead and Copper findings from the samples collected on September 11, 2015 to the Los Angeles County Department of Public Health – Environmental Health, Drinking Water Program (DPH). In addition, the System failed to retain the original records of all sampling data and analyses on its premises.

The System provided a copy of the Lead and Copper sample results from sampling that was conducted on April 13, 2016. During DPH's review to determine compliance with the LCR, it was discovered that no other data set had been submitted. Between August 2017-January 2018, DPH reached out to the System's operator (Morrison Wells) numerous times to inquire about any additional Lead and Copper sampling that had been conducted. The operator informed the DPH that no additional sampling had been taken; therefore, no results were provided to the State Water Resources Control Board (SWRCB) or the DPH.

On March 19, 2018, DPH was contacted by the System's operator indicating that additional samples had been taken in September 2015; however, they did not possess a copy of the sampling results. DPH reached out to FGL Environmental Agricultural Labs and obtained a copy of the Lead and Copper sampling results for samples collected on September 11, 2015.

## Lead and Copper Rule Reporting and Recordkeeping Compliance

Section 64690.10 of Title 22, California Code of Regulations (CCR) requires that each water system report the lead and copper tap sampling information within the first 10 days after the end of each period during which such sampling or monitoring was conducted: (1) the results of all tap samples including the location of each site and the associated tier criteria from section 64676; (2) the 90th percentile lead and copper concentrations calculated pursuant to section 64678; and (3) with the exception of the first period of tap sampling, an identification of any site that was not sampled during previous periods, along with an explanation of why the sampling site was changed.

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Section 64690.80 of Title 22, California Code of Regulations (CCR) requires that each water system retain on its premises original records of all sampling data and analyses, reports, surveys, letters, evaluations, schedules, Department determinations, and any other information required. Each water system shall retain the records required for no fewer than 12 years or two compliance cycles (as defined in Section 64400.20), whichever is longer.

The System is hereby directed to take the following actions:

- 1. Notify all persons within the area served by the System of the violation of Section 64690.10 and 64690.80 no later than March 30, 2018. Section 64463.4(b) of Title 22, CCR requires that the notification be conducted as soon as possible within 30 days after the water system learns of a violation. The System shall deliver the notice to water users within the required time period by mail or direct delivery. In addition, the System shall use one or more of the following methods to reach persons not likely to be reached by a mailing or direct delivery (renters, university students, nursing home patients, prison inmates, etc.): 1) publication in a local newspaper, 2) posting in conspicuous public places served by the District's water system, or on the Internet; or 3) delivery to community organizations. A template for conducting this notification is provided as Attachment 1.
- 2. The Certification of Tier Public Notice form must be completed and returned to the Los Angeles County Department of Public Health, Environmental Health, Drinking Water Program at <a href="mailto:swsadmin@ph.lacounty.gov">swsadmin@ph.lacounty.gov</a> no later than April 3, 2018. The Certification is provided as Attachment 2.
- 3. The Lead and Copper Rule Reporting Form shall be completed and submitted to the SWRCB and DPH along with the September 11, 2015 test results no later than March 30, 2018. The Form is provided as Attachment 3.
- 4. Enclosed, as Attachment 4, is an invoice of \$260.00 for the enforcement activities associated with this violation. The invoice shall be paid by April 23, 2018.

The System is reminded that failure to comply by the deadlines specified above may result in citations and civil penalties.

If you have any questions regarding this matter, please contact Ms. Beverly Tway of the Drinking Water Program at (626) 430-5420.

Sincerely,

Lusi Mkhitaryan, REHS, MPH

Chief Environmental Health Specialist

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Department of Public Health/Environmental Health Division

3/22/2018 Date